

## CERTIFICATE OF COMPLIANCE

No. 22-179

UNITED STATES OF AMERICA,

Petitioner,

V.

HELAMAN HANSEN,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief for the State of Montana and 24 Other States as *Amici Curiae* in Support of Petitioner contains 5,273 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

State of Ohio County of Hamilton

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 25, 2023.

**Emily Mullins** 

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Sworn to and subscribed before me by said Affiant on the date designated below.

Date:

Notary Public

[seal]

JOHN D. GALLAGHER Notary Public, State of Ohio My Commission Expires February 14, 2023